

United States District Court
Southern District of Texas
FILED

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

MAY 26 2015

Clerk of Court

United States of America)
v.)
Pamela GORAY)
Mexican National)
Year of Birth: 1989)

Case No. M-15-820-M

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 13, 2015 in the county of Hidalgo in the
Southern District of Texas, the defendant(s) violated:

| <i>Code Section</i> | <i>Offense Description</i> |
|---------------------|--|
| 21 U.S.C. § 846 | Conspiracy to possess with intent to distribute approximately 1,564.84 kg of marijuana, a Schedule I Controlled Substance |

This criminal complaint is based on these facts:

See Attachment A.

Continued on the attached sheet.




Ryan Browning, HSI Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 5/26/2015



Judge's signature

City and state: McAllen, Texas

U.S. Magistrate Judge

Printed name and title

Attachment A

The information in this affidavit is provided for the limited purpose of establishing probable cause. This information is not a complete statement of all the facts related to this case.

On March 13, 2015, at 05:36 am, a vehicle driven by Pamela GORAY entered the U.S. Customs and Border Protection, Office of Border Patrol inspection station located on U.S. 281 near Falfurrias, Texas (hereinafter: Inspection Station). Approximately 39 minutes later, at 6:15 am, a tractor-trailer registered to an Indiana based company incorporated by GORAY entered the Inspection Station. A consensual search of the tractor-trailer resulted in the discovery of approximately 1,564.84 kg of marijuana concealed inside the trailer. The address of GORAY's Indiana residence was listed as the mailing address for the company and the tractor-trailer.

On May 25, 2015, Pamela GORAY applied for entry into the U.S. at the Progreso, Texas Port of Entry (hereinafter: Progreso POE). GORAY did not declare any goods or medications to U.S. Customs and Border Protection Officers (CBPOs) upon making entry. GORAY was referred for a secondary inspection where CBPOs discovered approximately 200 tablets of a suspected controlled substance concealed on her body.

Homeland Security Investigations, McAllen, Texas (HSI McAllen) met with GORAY in an interview room at the Progreso POE. GORAY was advised of her Miranda rights from a pre-printed form. GORAY stated she understood her rights, and waived her rights. GORAY signed the pre-printed form and agreed to speak with investigators without an attorney present.

During the interview GORAY said on March 13, 2015, she traveled through the Inspection Station and acted as a look-out for the tractor-trailer traveling behind her vehicle. GORAY stated she was instructed to call an unidentified male upon crossing the checkpoint, to relay information concerning the location of law enforcement units along U.S. 281, and to pick up the driver of a tractor-trailer in Falfurrias, Texas. GORAY said she suspected the organization she was acting as a look-out for was attempting to smuggle marijuana through the Inspection Station in the tractor-trailer, and had previously used tractor-trailers to smuggle marijuana.